

201-14189



NATALIE\_RUTHERFORD@fmc.com on 12/30/2002 11:24:10 AM

To: oppt.ncic@epamail.epa.gov, Rtk Chem/DC/USEPA/US@EPA  
cc: Richard Hefter/DC/USEPA/US@EPA






Subject:

FMC Corporation actively supports the EPA HPV Challenge Program and is pleased to submit the cover letter, proposed test plans and robust summaries for the two chemicals sponsored for the year 2002:

- Methyl 3,3-dimethyl-4, pentenoate - - CAS No. 63721-05-1
  - Methyl 4,6,6,6-tetrachloro-3,3-dimethylhexanoate - - CAS No. 64667-33-0

Please contact me if you have comments or questions regarding this submission.

Natalie Rutherford  
Global Regulatory Manager  
FMC Corporation

215-299-6680  DVE Step I Summaries 12-30.doc  DVE Step I Test Plan 12-30.doc  
 DVE Step II Test Plan 12-30.doc  DVE Step I & II Cover Letter.doc  DVE Step II Summaries 12-30.doc

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December 30, 2002

Administrator  
US Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
Attention: Chemical Right-to-Know Program

Registration Number:

Dear Administrator Whitman:

FMC Corporation actively supports the EPA HPV Challenge Program, AR-201 and is pleased to submit the proposed test plans and robust summaries for the two chemicals sponsored for the year 2002:

- Methyl 3,3-dimethyl-4, pentenoate - - CAS No. 63721-05-1
- Methyl 4,6,6,6-tetrachloro-3,3-dimethylhexanoate - - CAS No. 64667-33-0

FMC proposes Closed System Intermediate Status for both chemicals and information supporting exemption claims for Reduced SIDS Testing has been included in the robust summaries.

FMC understands there will be a 120-day review period for the test plan and that all comments received by EPA will be forwarded to FMC for consideration. Please contact me if you have comments or questions regarding this submission.

Sincerely,

Natalie Rutherford  
Global Regulatory Manager  
FMC Corporation  
Tel. 215.299.6680  
Fax 215.299.6468